May 4, 2016

The Honorable Mayor Allison Silberberg and Members of City Council
City of Alexandria
Alexandria, Virginia 22314

Re: Support for the Proposed Framework for the Combined Sewer System Long Term Control Plan Update

Dear Mayor Silberberg and Members of Council:

On behalf of the Environmental Policy Commission (EPC), I am writing to convey our views on the proposed framework of the Long Term Control Plan Update (LTCPU) to meet the City's combined sewer permit requirements. During the development of the LTCPU, EPC Member Steve Milone participated in the Ad Hoc Combined Sewer System Plan (CSSP) Stakeholder Group.

The EPC believes that the proposed LTCPU would be a significant step forward in reducing the amount of pollution from combined sewer overflows (CSOs) into the City's local waterways and the Chesapeake Bay. Reducing pollution into our waterways is both a regulatory requirement and consistent with our values as a City and commitment to our Eco-City Charter. We are particularly supportive of the green infrastructure component of the plan and the recommendation to require developers within the CSO area to separate sewage and storm water infrastructure, which is a policy recommendation included in the City's Environmental Action Plan (EAP).

While the EPC supports the overall LTCPU, we believe there may be opportunities for the City to reduce the overall cost of the plan over time through additional investments in green infrastructure and by developing a robust public private partnership (P3) strategy. For example, if investment in green infrastructure and P3 efforts proves successful in the early years of the compliance period, they could enable the City to reduce the size of the proposed storage tank and thus reduce the cost of the required gray infrastructure. Such green investments would also deliver additional co-benefits that will enhance the environmental sustainability of our City.

To that end, we recommend that Council direct City Staff to:

1. **Update Council and the EPC at least annually on the City's green infrastructure strategy, especially in the CSO area, and propose increases in such investments if they prove successful.** Green infrastructure uses vegetation, soils, and natural processes to soak up and store rainwater water where it falls to control wet weather pollution and create healthier urban environments. Such infrastructure can be deployed quickly and, if successful, can reduce the size, scale, and cost of future gray infrastructure should it still be required. Residents will see and benefit from green infrastructure as it helps increase our tree canopy and creates a more beautiful, vibrant and sustainable City. The City's proposal includes $115-170 million for gray infrastructure, and $5-7.5 million or less than 5% of the total in green infrastructure. Of the $5-7.5 million, much of it will be deployed outside of the targeted CSO area. The EPC would like to see more resources invested within the CSO area.

   Green infrastructure is playing a growing role in both CSO and broader stormwater mitigation efforts. Cities with similar challenges, such as Philadelphia and Atlanta, have made green infrastructure their primary solution for meeting CSO regulatory requirements. Further, while Washington, D.C. had initially proposed to build a similar tunnel and storage system as Alexandria, in response to concerns raised from environmental groups, including the National Resources Defense Council, Earthjustice, and the DC Environmental Network, D.C. Water worked with the U.S. Environmental Protection Agency (EPA) to increase its relative investment in green infrastructure. The revised plan reduces the amount and expense of gray infrastructure to be installed while providing equivalent pollution reduction.[1] D.C. Water's revised proposal now also incorporates objective metrics of performance and would require D.C. Water to implement green infrastructure on a certain number of acres, pursuant to a specific schedule.

   <u>Recommendations:</u>

   - Devise a plan and milestones for installing green infrastructure within the CSO area, including through maximizing large shade street tree installation, and report on the results annually.

   - Assess the potential for preservation and installation of permeable surfaces and other immediately actionable, as well as long term measures, to reduce storm water runoff and combined sewer volumes.

   - Increase investments in green infrastructure if they prove successful at mitigation and make associated reductions in gray infrastructure.

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[1]https://yosemite.epa.gov/opa/admpress.nsf/0/A62A0A6D1F59A03585257E4B0057CFA1

2. **Develop a strategy for public-private partnerships (P3) to assist in meeting the permit requirements in the CSO area and to address other storm water related needs (e.g. MS4) throughout the City.** The current LTCPU focuses mostly on where the City has direct control, specifically on public property and future private developments where the City can require developers to separate combined sewers. However, there could be significant mitigation opportunities through investments in P3. The U.S. EPA has grant funds available for localities that are willing to explore P3 to invest in green infrastructure as a CSO mitigation tool, which the City should explore. If the City moves forward with the establishment of a stormwater utility, which EPC supports, Council should also set aside some proceeds to invest in incentive programs for both residents and businesses to invest in green infrastructure.

Recommendations:

- Assess the opportunity to apply for grants from the U.S. EPA to support P3 efforts to promote green infrastructure.

- Set aside a portion of proceeds from a future stormwater utility to invest in in incentive programs for both residents and businesses to invest in green infrastructure.

While not directly related to the LTCPU, the EPC has recently heard concern about the City's plan for addressing the combined sewer overflows from Outfall #001 at Oronoco Bay. We understand that City staff will be addressing this issue more specifically in the near future. In the meanwhile, we recommend that the Old Town North SAP Advisory Group set ambitious goals for deploying green infrastructure in that area to help reduce these flows and to complement any future gray infrastructure strategy.

Thank you for your time and consideration, and for your work and commitment to the Eco-City goals.

Sincerely,

Jim Kapsis
Chair
Environmental Policy Commission